

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 14-CR-248

SHANE M. SELLS,

Defendant.

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**MOTION FOR ENTRY OF PRELIMINARY ORDER OF FORFEITURE**

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The United States of America, by its attorneys, James L. Santelle, United States Attorney for the Eastern District of Wisconsin, and Daniel R. Humble, Assistant United States Attorney for said District, hereby moves this Court pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure for an order forfeiting to the United States all right, title and interest in the property described in the forfeiture notice of the Indictment filed on December 16, 2014.

This motion is based on the provisions of Title 18, United States Code, Section 2253 and on all proceedings of record in this case. In particular, defendant Shane M. Sells pled guilty to Count One of the Indictment and pursuant to his plea agreement, agreed to the forfeiture of the property described in the forfeiture notice of the Indictment.

No affidavit or memorandum is submitted in support of this motion.

Dated at Green Bay, Wisconsin, this 8th day of May, 2015.

JAMES L. SANTELLE,  
United States Attorney

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